

*****Please be advised that the use of these forms may not be proper for your specific legal situation*****
 *****Please make an independent determination whether use of these forms is appropriate*****

UNITED STATES DISTRICT COURT
 DISTRICT OF NORTH DAKOTA

Marella Bettina Mangum

(Enter full name of each Plaintiff, above)

vs.

Civil Case No. _____
 (To be assigned by Clerk of Court)

Meridian Property Management LLC
 Fargo, North Dakota Judicial System
 Fremstad Law Firm

JURY TRIAL DEMANDED ☐ Yes ☒ No
 (Check one)

(Enter full name of each Defendant, above)

COMPLAINT (Rewritten on other sheet for clarity)

I. JURISDICTION. State the grounds for filing this case in Federal Court (include federal statutes or U.S. Constitutional provisions).

The Fair Debt Collection Practices Act (FDCPA) was violated because Meridian Property Management, Fremstad Law Firm, and the North Dakota Courthouse fail to give me a total amount of debt owed, and instead keep throwing out dollar amounts for garnishment of my wages. A creditor cannot misrepresent the amount owed under the FDCPA. Imposing a daily \$100 fine that totaled over \$8,000 without notifying me of the need for a response to the discovery and the consequences of not responding violated my due process rights as outlined in the Fifth & Fourteenth Amendments and reinforced by Federal Rule of Civil Procedure 37. I should have been provided with adequate notice and an opportunity to be heard before such a penalty was levied. Title VI of the Civil Rights Act of 1964 was violated by the Fargo North Dakota Judicial System when I was not properly informed and not given a chance to be heard concerning the sanctions imposed by the Judge.

Complaint (Rewritten) Version

I. Jurisdiction

The Fair Debt Collection Practices Act (FDCPA) was violated because Meridian Property Management, LLC, Fremstad Law Firm, and the Fargo, North Dakota Courthouse fail to give me a total amount of debt owed, and instead keep throwing out dollar amounts for garnishment of my wages. A creditor cannot misrepresent the amount owed under the FDCPA. Imposing a daily \$100 fine that totalled over \$8,000 without notifying me of the need for a response to the Discovery and the consequences of not responding violated my due process rights as outlined in the Fifth and Fourteenth Amendments and reinforced by Federal Rule of Civil Procedure 37. I should have been provided with adequate notice, and an opportunity to be heard before such a penalty was levied. Title VI of the Civil Rights Act of 1964 was violated by the Fargo, North Dakota Judicial System when I, an African American female, was not properly informed, and not given a chance to be heard concerning the sanctions imposed by Judge Tom Olson.

II. PLAINTIFF. For each Plaintiff list: name and address including City, County and State.

Marella Bettina Mangum
22 Westchester Court Apt. 10
Birmingham, Alabama 35215

III. DEFENDANT. For each Defendant list: name and address including City, County and State.

Meridian Property Management
2832 Sheyenne Street
West Fargo, ND 58078

Fargo North Dakota Courthouse
211 9th Street South
Fargo, North Dakota 58103

Remstad Law
3003 32nd Avenue South
Fargo, North Dakota 58103

IV. CLAIM. State the facts of your claim. Include the name of each person involved, dates and places. Be as specific as possible. Do not give any legal argument or cite any cases or statutes. Use additional sheets of paper if necessary.

The events that led up to the wrongful wage garnishment are as follows:
 My husband, David Chakua, and I moved into a townhome that is managed by Meridian Property Management, LLC. The townhome is located at 1563 11th Avenue East in West Fargo, ND. We moved in on either April 30, 2016 or May 1, 2016 and paid a monthly rent of \$1350. We renewed the lease for another year and went month to month for \$1400/month after April 30, 2018. So, we did not vacate the townhome until August 31, 2018. We started a new lease on August 31, 2018 at the West Lake Apartments located at 639 33rd Avenue West Apartment 320 in West Fargo, North Dakota. The lease at the West Lake Apartments ended on August 31, 2019.

After My husband and I moved out of the townhome managed by Meridian Property Management, LLC and while living at the West Lake Apartments, I

V. ADMINISTRATIVE PROCEDURES. If applicable, state whether your claim was heard by any administrative agencies; the type of proceedings; the date and place of any proceedings; the outcome of any administrative proceedings.

N/A

→
see
other
sheet.

IV Claim cont

decided to file a lawsuit against Meridian Property Management, LLC for several incidents that occurred while we were tenants. While we were tenants, we were mistreated, exposed to black mold, harassed, lied to, and put in danger by decisions made by Meridian Property Management's maintenance personnel. So, I hired Nicholas Nelson Attorney at Law for Southern Valley Legal Services PLLC of Wahpeton, ND around September 19, 2018 to represent me in the case against Meridian Property Management, LLC. I corresponded with my lawyer, Nicholas Nelson, by email and phone on several occasions answering Discovery and other issues pertaining to the case up until around June 7, 2019, and not once did he mention that I would be sanctioned for not responding to Discovery. Judge Tom Olson imposed sanctions of \$100/day around April 23, 2019 for a total of \$8,800. I lost contact with my lawyer, Nicholas Nelson after June 7, 2019, and I did not hear from him again until October 3, 2023 when I sent him an email with the letters concerning the wage garnishment. After June 7, 2019, I tried contacting Nicholas Nelson numerous times by phone and email to find out what was going on with the case with Meridian Property Management, LLC, and I received no response. I thought that he was in jail or had passed away. I was surprised when he answered my October 3, 2023 email concerning the wage garnishment. I knew nothing about the judgement and the sanctions, and all of a sudden I am being garnished for thousands of dollars with no exact total amount to be owed.

On October 25, 2023, I contacted the

District Court in Fargo, ND to find out why my wages were being garnished and for how much. I was told by an employee there at the District Court that a court order is not required for a wage garnishment, and that the court there in Fargo did not issue the wage garnishment. She said that the Law Firm issues the wage garnishment without a court order. I told her that a court order is needed to issue a wage garnishment for a situation like mine. She kept saying that the court there in Fargo, ND did not issue the wage garnishment because a court order is not needed for that. I was terribly confused. So, I asked if she could send me the court documents showing **proof of the judgement**. She said that she might have trouble **emailing** the documents because of issues with the file. So, I asked if she could mail them to me. She told me to give her some time, and she will try emailing the documents. A short while later, I received the court documents with the judgement by PDF from Constance (Connie) Economos, Deputy Clerk of District Court in Fargo, ND. The court documents showed that Judge Tom Olson awarded Meridian Property Management, LLC attorney fees plus interest, and \$100/day sanction that **totalled \$8,800**. The Judge imposed a sanction on me that I knew nothing about. As far as I was concerned, I had answered all of the Discovery for the case.

My wages were garnished the first time in 2023 for over \$11,000. I completed that garnishment. Now, my wages are being garnished again in 2025 for over \$13,000. Nobody can tell me the total amount I supposedly owe, and when the garnishments will stop. I

②

Contacted the Courthouse in Fargo, ND on June 4, 2025 to find out the total amount for the garnishment.

The Fargo, ND Courthouse employees told me that interest will continue to be added to the Judgement, and essentially I can be garnished forever with no total amount to be garnished.

I cannot afford to support the lifestyle of others. I am being taking advantage of financially by Meridian Property Management, LLC and Fremstad Law Firm. The Judicial System in Fargo, ND failed to provide me, an African American female struggling to make ends meet, a fair and just trial, and they did not notify me of the sanctions that were imposed for a Discovery that I had already answered.

VI. RELIEF. State what you want the Court to do for you. I would like the Courts to stop Meridian Property Management, LLC and Fremstad Law Firm from garnishing my wages. I would like the debt to be called paid in full, and removed from my Credit Report. Due to the ^{nutrient deficiencies} Financial hardship, damage to my credit, pain and suffering, mental anguish, and discrimination I suffered from being unfairly treated by the Judicial System in Fargo, ND because I am an African American female, I would like to demand \$10 million dollars from the Defendants. I would also like the Courts to suspend all Wage garnishment by the Defendants until the case has been determined.

VII. SIGNATURE. Each Plaintiff must individually sign this complaint.

Signed this 16 day of July, 2025.

Marella Bettina Mangum

Signature of Plaintiff

Signature of Plaintiff

Marella Bettina Mangum

Printed Name of Plaintiff

Printed Name of Plaintiff

22 Westchester Court Apt. 10

Mailing Address

Mailing Address

Birmingham, Alabama 35215

City, State, Zip Code

City, State, Zip Code

701-934-4372

Telephone Number of Plaintiff

Telephone Number of Plaintiff